

PATENT  
Atty. Dkt. No. ROC920000259US1  
MPS Ref. No.: IBM2K0259

### REMARKS

This is intended as a full and complete response to the Final Office Action dated June 17, 2005, having a shortened statutory period for response set to expire on September 17, 2005. Applicant submits this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 3-5, 7-9, 11-18, 21-22, 24-35, 37, 40-41 and 43-46 are pending in the application. These claims remain pending following entry of this response.

#### Claim Rejections - 35 U.S.C. § 102

Claims 1, 3-5, 7-9, 11-18, 21-22, 24-35, 37, 40-41 and 43-45 are rejected under 35 U.S.C. 102(e) as being anticipated by *Lakritz* (US 6,623,529). Applicant respectfully traverses this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Lakritz* does not disclose "each and every element as set forth in the claim." For example, *Lakritz* does not disclose transforming a webpage using a dictionary driven stylesheet, as recited in independent claims 1, 12, 22, 31, 41, and 45. More generally, *Larkrtz* does not disclose the use of stylesheets. Generally, a stylesheet is composed using a computer language that describes the style of elements in a document marked up using a markup language. For example, "Extensible Stylesheet Language (XSL) is a programming language for creating stylesheets, wherein the XSL code describes how data sent over the web using the XML is to be presented to the user." See *application*, p. 6.

PATENT  
Atty. Dkt. No. ROC920000259US1  
MPS Ref. No.: IBM2K0259

The Examiner argues that *Lakritz* discloses using a stylesheet at *Lakritz*, 26:20-25. However, the cited passage is in fact directed to the use of a template document that "contains placeholders for country and language specific information that has been removed from a document. This information is dynamically inserted from a TermDB, another template, or provided automatically by WebPlexer when the composite document is presented to the browser." *Lakritz*, 25:21-25. As disclosed, the WebPlexer application uses a series of "server-side include" directives (see, e.g., *Lakritz*, 25:53-25, specifying "WPReplace" tags which become an element of the template document) and CGI scripting tools are used to fill in the template document. While this accomplishes the act of template completion described by *Lakritz*, it fails to disclose the use of a dictionary driven stylesheet, or using a stylesheet at all.

Furthermore, *Lakritz* discloses using a markup tags to define placeholder locations in the template to fill in with a term from a glossary. Applicant, however, claims using an attribute for the element in the source web page. Applicant asserts that mark-up elements and attributes, as these terms are used to describe markup language constructs, are distinct from one another. An example will clearly highlight the distinction: HTML documents are broken up in to markup elements, and each element may have content and attributes. The following illustrates a use of an element enclosed within a server-side include as disclosed in *Lakritz*: "<!--WPReplaceBegin -->hello<!--WPReplaceEnmd -->" *Lakritz*, 27:41. The server-side include tags bracket the element. In contrast, the following illustrates a markup element that includes an attribute: "<label nlsid="password"/>". As is readily apparent, it is not the presence or absence of the element, or enclosing an element with a pair of markup tags, that indicates something should be translated (as disclosed in *Lakritz*), it is the presence of a predefined attribute for the element.

For these reasons, Applicant submits that *Lakritz* does not disclose a predefined parameter with an element in a source web page to be translated, wherein the predefined parameter comprises an attribute for the element in the source web page, and further fails to disclose translating the content of the element using a dictionary driven stylesheet, or using stylesheets generally. Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Page 13

387240\_1

PATENT  
Atty. Dkt. No. ROC920000259US1  
MPS Ref. No.: IBM2K0259

Claim Rejections - 35 U.S.C. § 103

Claim 45 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Lakritz* as applied to claim 43 above, in further view of *Raggett et al.* (HTML 4.01 Specification, hereinafter *Raggett*). Although the rejection references claim 45, the substance of the rejection appears to be directed to claim 46; Applicant responds accordingly.

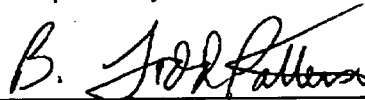
Applicant respectfully traverses the rejection. As described above, *Lakritz* fails to disclose using a dictionary driven stylesheet. Claim 45, the parent of claim 46 specifically recites applying an extensible stylesheet language transformation to a web page. Nothing in *Lakritz* discloses using extensible stylesheet language transformations. Rather, as described above, *Lakritz* discloses using server-side includes to fill in a template document with terms from a glossary. Accordingly, Applicant believes the rejection of dependent claim 46 to be obviated without the need for further comment.

Conclusion

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact the undersigned attorney to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted,



B. Todd Patterson  
Registration No. 37,906  
MOSER, PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant

Page 14

387240\_1